REMARKS/ARGUMENTS

Upon entry of the above amendment, claims 11, 16 and 17 will have been amended for consideration by the Examiner. In view of the above, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejections of all the claims pending in the present application. Such action is respectfully requested and is now believed to be appropriate and proper.

Initially, Applicant would like to express his appreciation to the Examiner for the detailed Official Action provided.

Applicant notes with appreciation the Examiner's acknowledgment of Applicant's Information Disclosure Statement filed in the present application on October 24, 2001 by the return of the initialed and signed PTO-1449 Form, and for consideration of the documents cited in the Information Disclosure Statement.

Turning to the merits of the action, the Examiner has rejected claims 11-13 and 15-17 under 35 U.S.C. § 103(a) as being anticipated by YOSHIDA et al. (U.S. Patent No. 6,801,546). The Examiner has rejected claim 14 under 35 U.S.C. § 103(a) over YOSHIDA et al. in view of MORI (U.S. Patent No. 6,384,927).

As noted above, Applicant has amended claims 11, 16 and 17 and resubmitted the same for consideration by the Examiner. Applicant respectfully traverses the above rejection based on the amended claims 11-17 and will discuss the outstanding rejection with respect to these claims in the present application as will be set forth hereinbelow. The amended claims merely clarify the subject matter recited in the rejected claims, but do not narrow the scope of the claims.

Applicant's claims 11-15 generally relate to a facsimile apparatus which transmits image data to a relay Internet facsimile apparatus via PSTN. The relay Internet facsimile apparatus transmits the image data to a plurality of receiving Internet facsimile apparatus via the Internet. Each of the plurality of the receiving Internet facsimile apparatus has a sub-address and an IP address. The facsimile apparatus has an input which inputs image data and a panel configured to input predetermined information identifying the relay Internet facsimile apparatus and sub-addresses of the plurality of receiving Internet facsimile apparatuses. The relay Internet facsimile apparatus has a memory that stores IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses.

The facsimile apparatus further comprises a controller which, when the predetermined information and the sub-addresses of the plurality of receiving Internet facsimile apparatuses are input by the panel, transmits, to the relay Internet facsimile apparatus via the PSTN, the input image data and the input sub-addresses of the plurality of receiving Internet facsimile apparatuses, based on the input predetermined information identifying the relay Internet facsimile apparatus. Then, the relay Internet facsimile apparatus converts the transmitted image data into data for Internet transmission and relays the converted data to the plurality of the receiving Internet facsimile apparatuses via the Internet, based on the IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses stored in the memory. Claim 16 recites a related relay Internet facsimile apparatus. Claim 17 recites a related method.

In direct contrast, YOSHIDA et al. relates to a network system in which the facsimile machine A transmits image data to the service provider A, the service provider A transmits the image data, as an affixed file of an e-mail, to the service provider B via the Internet (column 28, lines 1-17). The facsimile machine A has the registration circuit 29 that registers an IP address of the service provider B and a telephone number of the facsimile machine B (column 27, lines 46-56). The facsimile machine A transmits, to the service provider A, "in the sub-address data" the IP address of the service provider B and the telephone number of the facsimile machine B (column 27, lines 46-56).

However, YOSHIDA et al. does not disclose a facsimile apparatus which inputs predetermined information identifying the relay Internet facsimile apparatus and sub-addresses of a plurality of the receiving Internet facsimile apparatus, the relay Internet facsimile apparatus having a memory that stores IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses, each of the plurality of the receiving Internet facsimile apparatuses having a sub-address and an IP address. Rather, YOSHIDA et al. discloses the facsimile machine A which transmits, to the service provider A, the IP address of the service provider B and the telephone number of the facsimile machine B "in the sub-address data" or in the "sub-address signal" (column 27, lines 53 and 59). The service provider A does not store an IP address of the facsimile machine B and the telephone number of the facsimile machine B. In other words, in YOSHIDA et al., the service provider B associated with the IP address (that is stored) is distinct from the facsimile machine B. On the other hand, in the present

invention, the receiving Internet facsimile apparatus associated with the IP address is the same as the receiving Internet facsimile apparatus associated with the sub-address. Thus, in YOSHIDA et al., the facsimile machine only has a telephone number, while in the present invention, each of the plurality of the receiving Internet facsimile apparatus has a sub-address and an IP address.

Yet additionally, YOSHIDA et al. does not disclose a memory in the relay Internet facsimile apparatus (considered by the Examiner to be service provider A) that stores addresses of the plurality of receiving Internet facsimile apparatuses corresponding to sub-addresses of the plurality of receiving Internet facsimile addresses as recited in Applicant's claims. Applicant's claims require the memory to store IP addresses and corresponding sub-addresses. As is clearly set forth in the paragraph bridging columns 27 and 28 of YOSHIDA et al., the facsimile machine A performs facsimile communication with the service provider A. In performing the facsimile communication, the facsimile machine A sets the IP address of the service provider B and the telephone number of the facsimile machine B in the sub-address data in the facsimile communication procedure of IPUT.30. In other words, the IP address and the telephone number of the service provider are located in the sub-address data of the facsimile communication procedure. However, no sub-address of an apparatus is provided therein. Rather, according to the teachings of YOSHIDA et al., the sub-address area is utilized as a storage location for retaining the IP address of the service provider B and the telephone number of the facsimile B.

As is clear from this paragraph of YOSHIDA et al., the sub-address region or location is utilized to store an IP address of a service provider B and a telephone

number of the facsimile B but no sub-address of the receiving Internet facsimile apparatus is stored therein. In contrast, according to the teachings of Applicant's invention, the relay Internet facsimile apparatus has a memory that stores IP addresses, of the plurality of receiving Internet facsimile apparatuses corresponding to sub-addresses of the plurality of receiving Internet facsimile apparatuses. YOSHIDA et al. merely uses the sub-address region to store information (i.e., IP address and telephone number) of a service provider and a facsimile machine. This is quite distinct from the recitations of Applicant's claims.

YOSHIDA et al. also does not disclose a facsimile apparatus which transmits the input image data to the relay Internet facsimile apparatus via the PSTN, the relay Internet facsimile apparatus relaying the converted data to the plurality of the receiving Internet facsimile apparatuses via the Internet, based on the IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses stored in the memory of the relay Internet facsimile apparatus.

Rather, YOSHIDA et al. discloses a facsimile machine A which transmits the image data to the service provider A via the PSTN, the service provider A relaying the converted data to the service provider B via the Internet, based on the IP address of the service provider B, the IP address of the service provider B being transmitted by the facsimile machine A to the service provider A. In other words, in YOSHIDA et al., the service provider A receives the IP address of the service provider B from the facsimile machine A in order to relay the converted data to the service provider B via the Internet. Further, in YOSHIDA et al., the service provider B receives the telephone number of the

facsimile machine B from the facsimile machine A via the service provider A in order to relay the image data to the facsimile machine B via a PSTN. Thus, in YOSHIDA et al., the service provider A has no need to store IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses. Rather, the memory recited in the pending claims is not disclosed by and is unnecessary for the operation of the YOSHIDA et al. communication apparatus.

In setting forth the rejection regarding YOSHIDA et al., the Examiner admits that YOSHIDA et al. does not teach that "the panel inputs plurality of sub-addresses of the receiving Internet facsimile apparatus". The Examiner however derives from claim 1 of YOSHIDA et al. that the communication apparatus of YOSHIDA et al. can receive more than one sub-address. Regardless of the other shortcomings and deficiencies of the YOSHIDA et al. reference, this assertion by the Examiner in interpreting the language of claim 1 of YOSHIDA et al. is incorrect. The term "at least" in claim 1 of YOSHIDA et al. does not include therein plural sub-addresses and transmission data but includes information in addition to the sub-address and transmission data. There is no implication in YOSHIDA et al. that plural sub-addresses can be received. As noted above, there is also no need for such plural sub-addresses in the YOSHIDA et al. device.

Thus, the pending claims are clearly distinguished over YOSHIDA et al.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 11-17 are not disclosed in YOSHIDA et al. cited by the Examiner. The pending claims are also submitted to be patentable over the Examiner's proposed reference

since YOSHIDA et al. does not render obvious the combination of the above-noted features recited in Applicant's claims 11-17.

Regarding the rejection of claim 14 under 35 U.S.C. § 103 as unpatentable over YOSHIDA et al. in view of MORI, the Examiner asserts in the outstanding Official Action filed on October 3, 2005 that MORI discloses an Internet facsimile machine (Figs. 1-2) transmitting image data to a relay Internet facsimile apparatus which uses NSS signal to transmit the sub-address of the receiving Internet facsimile apparatus (column 10, lines 53-57).

MORI relates to a system in which a first repeater Internet facsimile machine FI1 is installed in the same country as the transmitting machine FX1, the first repeater Internet facsimile machine FI1 transfers the image information to a second repeater Internet facsimile machine F12, the second repeater Internet facsimile machine F12 is installed in a different country from the first repeater Internet facsimile machine FI1, and the second repeater Internet facsimile machine F12 is installed in the same country as the recipient machine FX2.

However, MORI does not disclose a facsimile apparatus which inputs predetermined information identifying the relay Internet facsimile apparatus and the sub-address of a plurality of receiving Internet facsimile apparatuses, the relay Internet facsimile apparatus having a memory that stores IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses, each of the plurality of the receiving Internet facsimile apparatus having a sub-address and an IP address. Rather, MORI discloses an ordinary facsimile machine FX1 which transmits, to the repeater Internet

facsimile machine FI1, the e-mail address of the repeater Internet facsimile machine FX2 and the sub-address of the ordinary facsimile machine F12. The repeater Internet facsimile machine FX1 does not store an IP address of the ordinary facsimile machine F12 and the sub-address of the ordinary facsimile machine FI2. In other words, in MORI, the repeater Internet facsimile machine FX2 of the e-mail address is distinct from the ordinary facsimile machine FI2 associated with the sub-address. On the other hand, in the present invention, the receiving Internet facsimile apparatus associated with the IP address is identical to the receiving Internet facsimile apparatus associated with the sub-address. Thus, in MORI, ordinary facsimile machine FI2 only has a sub-address, while in the present invention, each of the plurality of the receiving Internet facsimile apparatus has both a sub-address and an IP address.

MORI et al. also does not disclose a facsimile apparatus which transmits the input image data to the relay Internet facsimile apparatus via the PSTN, the relay Internet facsimile apparatus relaying the converted data to the plurality of the receiving Internet facsimile apparatuses via the Internet, based on the plurality of the IP addresses of the receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses stored in the memory of the relay Internet facsimile apparatus. Rather, MORI discloses an ordinary facsimile machine FX1 which transmits the image data to the repeater Internet facsimile machine FX1 via a telephone network, the repeater Internet facsimile machine FX1 relaying the converted data to the repeater Internet facsimile machine FX2 via the Internet, based on the e-mail address of the repeater Internet facsimile machine FX2 stored on the parameter memory of the repeater Internet facsimile machine FX1. The

parameter memory 3 of the repeater Internet facsimile machine FX1 stores the sub-address of the ordinary facsimile machine FI2 and the corresponding e-mail address of the repeater Internet facsimile machine FX2. The parameter memory 3 of the repeater Internet facsimile machine FX1 does not store the sub-address of the destination facsimile machine FI2 and the corresponding e-mail address of the destination facsimile machine FI2. On the other hand, in the present invention, the relay Internet facsimile apparatus has a memory that stores IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses.

Thus, the pending claims are clearly distinguished over MORI.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 11-17 are not disclosed in MORI cited by the Examiner. The pending claims are also submitted to be patentable over the Examiner's proposed combination since neither YOSHIDA et al., MORI, nor the combination thereof render obvious the combination of the above-noted features recited in Applicant's claims 11-17.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejections and requests an indication of the allowability of all the claims pending in the present application, in due course.

Although the status of the application is after Final Rejection, Applicant submits that entry of the amendment is proper under 37 C.F.R. § 1.116. In particular, no new issues requiring further consideration or search are being presented.

In particular, by the present Response, Applicant is amending the claims merely to more clearly recite features of the present invention. In particular, and taking claim

11 as an example, the memory has previously been recited to store "a plurality of IP addresses of the receiving Internet facsimile apparatuses corresponding to the plurality of sub-addresses of the receiving Internet facsimile apparatuses". By the present Response, Applicant is amending the preamble to the more clearly define that each of the plurality of receiving Internet facsimile addresses has a sub-address and an IP address. This does not raise any new issues requiring further consideration or search since this feature was previously already recited in the body of the claim.

In addition to the above, Applicant's amendments merely clarify the recitations of Applicant's invention by modifying the terminology used in the claims also without raising any new issues requiring further consideration or search.

Additionally, Applicant's remarks make clear that the features of Applicant's invention as embodied in the claims are not taught, disclosed nor rendered obvious by the disclosure of YOSHIDA et al. or any proper combination of YOSHIDA et al. and MORI without regard to the clarifying amendments made by the present Response. Accordingly, entry of the present Response, which is in full compliance with 37 C.F.R. § 1.116, is respectfully requested and is believed to be appropriate.

SUMMARY AND CONCLUSION

Applicant has made a sincere effort to place the present application in condition for allowance and believes that he has now done so. Applicant has amended the rejected claims for reconsideration by the Examiner. With respect to the pending claims, Applicant has pointed out the features thereof and has contrasted the features of the claims with the disclosures of the references. Accordingly, Applicant has provided a clear evidentiary basis supporting the patentability of all claims in the present application and respectfully requests an indication of the allowability of all the claims pending in the present application in due course.

Any amendments to the claims which have been made in this amendment, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

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